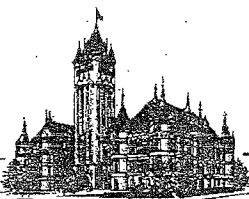


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City of Liberty Lake

S P O K A N E



C O U N T Y

DIVISION OF ENGINEERING AND ROADS

A DIVISION OF THE PUBLIC WORKS DEPARTMENT

December 8, 2006

Post-It™ brand fax transmittal memo 7671		# of pages > TWO
To DOUG SMITH	From SPO ENG.	
Co. CITY OF L.L.	Co. SPO CO.	
Dept.	Phone # 477 7245	
Fax # 755 6713	Fax #	

Doug Smith, Director  
City of Liberty Lake  
Planning and Community Development Department  
22710 East Country Vista Boulevard  
Liberty Lake, WA 99019

RE: Urban Growth Area Boundary Alternatives DEIS

Mr. Smith:

Thank you for the opportunity to review the DEIS for the proposed Urban Growth Area Boundary for the City of Liberty Lake. Spokane County Engineering offers the following comments for inclusion in the FEIS.

With regard to transportation issues it is noted that the UGA Alternatives #2-7 include areas within Spokane County that have been traditionally developed to a suburban or rural density and do not have adequate existing transportation facilities to accommodate urban densities. Planning for transportation facilities within those areas will require changes to the Spokane County Arterial Road Plan and text changes in the Transportation Section of the Spokane County Comprehensive Plan and Capital Facilities Plan. The UGA Alternatives are also located within the jurisdiction of Spokane County, therefore any future transportation improvements shall comply with Spokane County Standards for Road and Sewer Construction.

We note that the UGA Alternatives do leave an interesting area of "no man's land" on the southwestern boundary of the City of Liberty Lake and the southeastern boundary of the City of Spokane Valley. This area is best illustrated on Map 1.2 on page 1-2 of the DEIS. Approximately one mile of Sprague Avenue is located in this area, as is the intersection of Sprague Avenue and Henry Road. The area has suburban style homes to the south of Sprague Avenue and larger parcels to the north. It seems appropriate that this area be included in the UGA Alternatives for consistency in Transportation Planning for both Spokane County and the City of Liberty Lake because the DEIS does propose future improvements to Sprague Avenue and Henry Road, including the intersection of Sprague Avenue and Henry Road

Again, since the proposed UGA Alternatives are within the jurisdiction of Spokane County, we ask that County Engineering be included in all planning processes related to transportation planning to ensure that the best facilities are available to the traveling public.

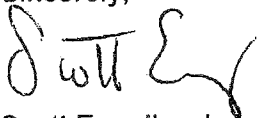
With regard to storm drainage Spokane County offers the following comments. When reviewing alternatives #2, #4, and #6 it would appear that the southwest corner of the proposed UGA would include an area designated as seasonal marsh and floodplain. This could have an impact on the amount of development that could be anticipated for that area.

Spokane County has been working collaboratively with the City of Spokane and the City of Spokane Valley to develop a regional stormwater manual. This manual has been coordinated with the Department of Ecology and will be an equivalent manual for the Stormwater Management Manual for Eastern Washington. We anticipate adopting this manual in the coming year and would hope that the City of Liberty Lake would consider adopting it. This would assist the private engineers with consistent standards and would insure that stormwater facilities would be compatible between the City of Liberty Lake and Spokane County.

Finally, as a general note the soils in the area south of the current city limits being proposed for inclusion in the UGA differ significantly from the soils that are predominant in the City of Liberty Lake currently. The area to the south includes soils such as the Spokane, Narcisse, Glenrose, Bernhill, and Semiahmoo series. These soil groups do not infiltrate water as well as the Garrison, Marble, and Phoebe soil groups that underlie the majority of the City of Liberty Lake. The soils to the south also tend to be worse subgrade for structures and roadways. These characteristics when combined with the steeper topography will significantly affect the density and expense of development. This should be factored into the area required to support the population increase.

Should you need additional information or have any other questions please contact me at 509-477-3600.

Sincerely,



Scott Engelhard  
Transportation Engineering Coordinator  
Division of Engineering and Roads

Cc: Robert Brueggeman, P.E., Spokane County Engineer

000180

**Response to Scott Englehard, Transportation Engineering Contractor, Spokane County  
Division of Engineering and Roads:**

**Not a comment on the adequacy of the DEIS, but rather an expression of concern for  
various issues that will be addressed at time of any project permit application.**

## Doug Smith

---

**From:** Figg, Greg [FiggG@WSDOT.WA.GOV]  
**Sent:** Friday, December 08, 2006 3:11 PM  
**To:** dsmith@libertylakewa.gov  
**Cc:** sworley@spokanevalley.org; Engelhard, Scott; Wagemann, Glenn; Frucci, Mike; Gribner, Mike; Lenzi, Jerry C; Rohwer, Mark; White, Harold; McCallum, Darrel; Blegen, Robert; Olson, Ken (Eastern Region); Williams, Tammie  
**Subject:** Liberty Lake Annexation Comments -DEIS  
**Importance:** High

Doug, please find attached our comments on the Draft EIS that was conducted for the proposed annexation. If you have any questions please do not hesitate to let us know.

Sincerely,

Greg Figg  
WSDOT Planning  
(509) 324-6199

12/8/06



Washington State  
Department of Transportation  
Douglas B. MacDonald  
Secretary of Transportation

Eastern Region  
2714 N. Mayfair Street  
Spokane, WA 99207-2090  
509-324-6000  
Fax 509-324-6005  
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www.wsdot.wa.gov

December 8, 2006

Received By  
City of Liberty Lake

DEC 08 2006

Mr. Doug Smith  
City of Liberty Lake  
22710 E. Country Vista Blvd.  
Liberty Lake, WA 99019

City Clerk/Treasurer  
Initials JS

3:45

Re: City of Liberty Lake Urban Growth Boundary Expansion Draft - EIS Comments

Dear Mr. Smith;

Thank you for the opportunity to comment on the proposed urban growth boundary expansion Draft Environmental Impact Statement (DEIS). In reviewing this DEIS the Washington State Department of Transportation (WSDOT) does not agree that impacts to the Interstate transportation system have not been adequately addressed. In particular, WSDOT requests that the issues listed below be addressed in the Final EIS for this proposal:

### 3.8.2. Transportation and Circulation Impacts

It is stated "While there could be an increase in industrial and commercial uses, the impacts have been considered as part of the Liberty Lake Mitigation Plan." The Liberty Lake Mitigation Plan is currently being updated to look at new commercial, industrial, and residential areas, but this process has not yet been completed. The impacts from this potential development should not be considered mitigated at this time as this updated plan has not been finalized nor have the mitigations been agreed to.

It should also be stated that the area being considered for annexation is not all contained in the current Liberty Lake Mitigation plan boundaries. The area north of the river is not addressed in the current plan nor is a portion of the southern area. Consequently, impacts from the more urban development of this property have not been addressed in the Liberty Lake Mitigation Plan.

The DEIS does not provide specific text, data, and analysis to demonstrate how the traffic from this proposed annexation impacts Transportation and Circulation. WSDOT requests this information be provided for review.

660278

### 3.8.3. Transportation and Circulation Mitigating Measures

#### *General*

This section as presented in the DEIS raises concerns. Detailed mitigation measures involving the Interstate system are presented, but they are not supported by any documented analysis and they raise a number of questions.

What are the quantifiable impacts to the transportation facilities as a result of this proposed annexation?

Traffic data is not presented in the DEIS to support the discussed mitigation. Please provide this data for review.

How are the mitigations presented adequate?

What is the level of service prior to the development and after the development?

How are the mitigation options presented reasonably obtainable?

Text, data, and analysis need to be presented to answer the above questions and it is not found in the DEIS.

The EIS needs to identify what the impacts are to the transportation system by the preparation of a traffic analysis. From such an analysis a list of deficiencies can be put forth, to which potential mitigations can be identified. This section of the DEIS contains none of this needed crucial technical information to justify the mitigation options presented. WSDOT requests an opportunity to review and comment on this information. Additionally, The Spokane Regional Transportation Council must review and agree with the traffic impact analysis as required by federal law.

Some of the proposed improvements in this section involve the Interstate Highway System. Said system is under the control of WSDOT and the Federal Highway Administration (FHWA). Any improvements to the Interstate Highway System must be approved by both WSDOT and FHWA. FHWA needs to be added as an agency of jurisdiction for the transportation system. How have you included FHWA in this process as an agency of jurisdiction?

Section 1425 of the WSDOT Design Manual identifies the steps that must be followed to gain approval for modifications to the Interstate Highway System. This has previously been discussed with the City and is attached to this letter for reference. Please note the eight policy points that need to be addressed prior to receiving approval to modify access points on the Interstate system.

To date no technical information has been submitted to WSDOT for review or comment in conjunction with this process. To prejudge the outcome of a process that has not begun by suggesting mitigation on facilities outside the approval purview of the City without concurrence from the approving agencies is not appropriate.

The impacts to the Barker Road/I-90 and Idaho Road/I-90 interchanges are not mentioned in the DEIS. Based on the impacts to the adjacent facilities both the Barker Road and Idaho Road interchanges also appear to be impacted by this proposal. Additionally, impacts to the Barker and Trent Ave. intersection are not mentioned or addressed. WSDOT had requested via our October 16th letter (attached to the DEIS), to be involved in the scoping process to ensure intersections such as these were addressed. WSDOT was not contacted until the DEIS was issued. The impacts to these interchanges and intersections need to be addressed. WSDOT must be afforded an opportunity to review and comment on this information.

*Henry Road (continued)*

*I-90 Interchange –Reconstruct Interchange and Bridge (Greenacres interchange)*

Detailed text is provided on how this existing partial interchange could be reconstructed to a new full movement interchange including realignment of I-90. It is not appropriate to propose this as mitigation as this project has not been agreed to by WSDOT or FHWA and is outside of the approval purview of the City of Liberty Lake. Please address how the proposed mitigation can be suggested as a valid option to proceed forward with this proposal without consensus or agreement on the feasibility of the added interchange between the approving agencies? Additionally, what is the impact from this proposal (need to quantify)? What is the expected LOS before and after annexation? A traffic study needs to be prepared to identify the impacts and substantiate the benefits of the proposed mitigation.

*Harvard Road*

*I-90 Interchange – Widen/Reconstruct Bridge to 5-Lane & Increase Turn Movement Capacity*

Improvements to the Harvard Road and Henry Road (Greenacres) interchanges will affect one another given their locations. This interconnection is not addressed in the DEIS. Consequently, the same comments that are mentioned for Henry Road are applicable here.

In summary, this DEIS document lacks the necessary traffic information and transportation system analysis to identify what the impacts to the transportation system are likely to be. Without this information it is impossible to determine what mitigating measures should be implemented for this proposed annexation. Moreover, the mitigations proposed to the Interstate System have not been reviewed or approved by WSDOT or Federal Highways and may not be feasible or receive approval.

Mr. Smith  
December 8, 2006  
Page 4

WSDOT requests that the issues discussed in this letter be fully addressed in the Final EIS for this proposal. If you have any questions on this matter please do not hesitate to contact me at (509) 324-6199.

Sincerely,



Greg Figg  
Transportation Planner

attachment:

cc: Steve Saxton, Federal Highway Administration  
Dee Caputo, Community Trade and Economic Development  
Susan Winchell, Spokane County Boundary Review Board  
John Pederson, Spokane County Planning  
Steve Worley, City of Spokane Valley  
Pat Harper, Spokane County Engineers  
Glenn Miles, Spokane Regional Transportation Council  
WSDOT Distribution List



- 1425.01 General
- 1425.02 References
- 1425.03 Definitions
- 1425.04 Procedures
- 1425.05 Interchange Justification Report and Supporting Analyses
- 1425.06 Documentation

### 1425.01 General

This chapter provides guidance on Interchange Justification Reports (IJR), developing the required documentation for an IJR, and the sequence of an IJR presentation. The guidance is applicable to both Interstate and non-Interstate limited access routes. Engineers in the Washington State Department of Transportation (WSDOT) Headquarters (HQ) Access and Hearings Unit specialize in providing support for meeting the guidance provided in this chapter. They should be consulted early and frequently during the development of projects that require the types of documentation described herein.

Federal law requires Federal Highway Administration (FHWA) approval of all revisions to the Interstate system, including changes to limited access. Both FHWA and WSDOT policy require the formal submission of a request to either break or revise the existing limited access on Interstate and state routes, respectively. An IJR is the document used to request a new access point or access point revision on limited access freeways in Washington State. The IJR is used to document the planning process, the evaluation of the alternatives considered, the design of the preferred alternative, and the coordination that supports and justifies the request for an access revision. The IJR is scalable to the complexity of the proposal (see Figures 1425-1, 2, and 3).

A transportation proposal that requires a break in or revision to the existing limited access control, such as a new interchange, should begin with a study of the corridor to determine existing and future access needs. These needs then become part of the statewide plan, called the *State Highway System Plan*. The *State Highway System Plan* defines

*Service Objectives*, *Action Strategies*, and costs to plan for, maintain, operate, preserve, and improve the state highway system for the next 20 years. Work that does not fit any of the action strategies will not be authorized or considered in the development of the Statewide Transportation Improvement Program (STIP) or any other budget proposal. (See Chapter 120.) Alternatives should be developed and evaluated. A final preferred alternative is then analyzed, selected, approved, designed, constructed, maintained, and monitored.

The corridor study must evaluate existing local infrastructure and existing access points to determine whether an access point revision is necessary. The evaluation of the proposal begins by studying the corridor throughout the area of influence.

For all complex projects (new or significantly reconfigured interchanges), WSDOT strongly advises that a support team be established to help integrate the planning, programming, environmental, traffic, safety, and design efforts that lead to development of a proposal. When a third party, such as a local agency, is proposing an access point revision, FHWA requires that a study team be formed.

An IJR is a stand-alone document that includes the necessary supporting information needed for a request to break or revise the existing limited access. The IJR includes information about the proposed project, the new access or access point revision, and information about all other local and state improvements that are needed for the access to operate. The complexity of the report varies considerably with the scope of the proposed access point revision. For example, for minor ramp revisions, added on- and off-ramp lanes, and locked gates to sites normally accessed by another route, the approval request may be condensed to a letter format that includes adequate justification. An operational/safety analysis may be required to assure no adverse impacts to the Interstate or crossroad(s). Contact the HQ Access and Hearings Unit to determine the appropriate level of report documentation needed for all access changes.

An IJR cannot be approved prior to the approval of the project environmental document. For example, a project environmental document might be an Environmental Impact Statement (EIS) or an Environmental Assessment (EA). Approval of these documents is signified by a Record of Decision for an EIS, or a Finding of No Significant Impact might be issued for an EA document indicating an EIS is not required. (Chapter 220 provides further discussion on project environmental documentation.)

If the new or revised access proposal is found to be acceptable prior to the environmental approval, a finding of engineering and operational acceptability is granted by FHWA. Final approval of the IJR is granted concurrently with the appropriate environmental documentation. If the proposal is found to be acceptable after the project environmental document is approved, the IJR can be approved. On Interstate projects, a submittal letter shall be sent by the region through the WSDOT Access and Hearings Unit requesting final FHWA approval of the IJR. On non-Interstate projects, a similar process is followed, except that the WSDOT Assistant State Design Engineer grants the final approval, not the FHWA.

Recognizing that the time period between the approval of the IJR, the environmental documentation, and the construction contract commonly spans several years, the approved IJR will be reviewed and updated if significant changes have occurred during this process. A summary assessment will be submitted to the HQ Design Office and FHWA for evaluation to determine whether the IJR needs to be updated. Contact the HQ Access and Hearings Unit to coordinate this summary assessment.

## 1425.02 References

### (1) Law

Laws and codes (both federal and state) that may pertain to this chapter include the following:

*Code of Federal Regulations* (CFR) 23 CFR Part 450 (implementing 23 USC Section 111)

40 CFR Parts 51 and 93 (regarding federal conformity with state and federal air quality implementation plans)

*United States Code 23 USC Section 111* (requires the U.S. Secretary of Transportation to approve access revisions to the Interstate System), 134 (Metropolitan Planning), and 135 (Statewide Planning)

### (2) Design Guidance

The following contain guidance that is included by reference within the text:

*Highway Capacity Manual*, Special Report No 209 (HCM), Transportation Research Council

*Local Agency Guidelines* (LAG), M 36-63, WSDOT

### (3) Supporting Information

The following were used in the development of this chapter or contain additional information:

Forecasting and Methods Matrix (when available), WSDOT

Notice of policy statement: "Additional Interchanges to the Interstate System," Federal Highway Administration notice published in the Federal Register, October 22, 1990 (Vol. 55, No. 204)

Notice of policy statement: "Additional Interchanges to the Interstate System," Federal Highway Administration notice published in the Federal Register on February 11, 1998. (Vol. 63, No. 28) (accessible in [http://www.access.gpo.gov/su\\_docs/fedreg/a980211c.html](http://www.access.gpo.gov/su_docs/fedreg/a980211c.html), under FHWA notices, "Interstate system, additional interchanges, policy statement, 7045-7047")

## 1425.03 Definitions

**access** A means of entering or leaving a public road, street, or highway with respect to abutting property or another public road, street, or highway.

**access break** Any point from inside or outside the state limited access right of way limited access hachures that crosses over, under, or physically through the plane of the limited access, is an access break or "break in access" (including, but not limited, to locked gates and temporary construction access breaks).

**access point** Any point from inside or outside the limited access hachures that allows entrance to or exit from the traveled way of a limited access freeway, including "locked gate" access and temporary construction access.

**access point revision** A new access point or a revision of an existing interchange/intersection configuration. Locked gates and temporary construction breaks are also access point revisions.

**accident rate** Accidents per one million vehicle miles traveled.

**alternatives** Possible solutions to accomplish a defined purpose and need. These include local and state transportation system design options, locations, and travel demand management and transportation system management type-improvements, such as ramp metering, mass transit, and high occupancy vehicle (HOV) facilities.

**area of influence** The area that will be directly impacted by the proposed action: freeway main line, ramps, crossroads, immediate off-system intersections, and local roadway system.

**assumptions document** A document developed at the beginning of the study phase to capture access study assumptions and criteria such as traffic volumes, design year, opening year, travel demand assumptions, baseline conditions, and design year conditions. The document also serves as a historical record of the processes, dates, and decisions made by the team.

**baseline** The existing transportation system configuration and traffic volumes for a specific year against which to compare possible alternative solutions.

**break** See "access break" above.

**design year** 20 years from the beginning of construction.

**ECS** Environmental Classification Summary (Documented Categorical Exclusion).

**FONSI** Finding of No Significant Impact (Environmental Assessment).

**freeway** A divided highway that has a minimum of two lanes in each direction, for the exclusive use of traffic, and with full access control.

**limited access** Full, Partial, or Modified access control is planned and established for a corridor and then acquired as the right to limit access to each individual parcel.

**need** A statement which identifies the transportation problem(s) that the proposal is designed to address and explains how the problem will be resolved. An existing or anticipated travel demand that has been documented through the study process to require a change in access to the state's limited access freeway system.

**no-build condition** The baseline, plus state transportation plan and comprehensive plan improvements expected to exist, as applied to the year of opening, or the design year.

**proposal** The combination of projects/actions selected through the project study process to meet a specific transportation system need.

**purpose** General project goals such as: (1) improve safety, (2) enhance mobility, or (3) enhance economic development.

**Record of Decision** Under the National Environmental Policy Act, the Record of Decision (ROD) accompanies the Final Environmental Impact Statement; explains the reasons for the project decision; discusses alternatives and values considered in selection of the preferred alternative; and summarizes mitigation measures and commitments that will be incorporated in the project.

**study area** The transportation system area to study in both step one of the study process and for an IJR. The study area is a minimum of one interchange upstream and downstream from the proposal.

**support team** An integral part of the IJR process consisting of an assemblage of people organized to develop and analyze solutions to meet the need of a proposal.

**Transportation Management Area (TMA)** Urbanized areas with populations of 200,000 or greater are federally designated as Transportation Management Areas.

**travel demand** Local travel demand constitutes short trips that should be made on the local transportation system, such as intracity roads and streets. Regional travel demand constitutes long trips that are made on the regional transportation system, such as Interstate, regional, and/or intercity/ interregional roads, streets, or highways.

**traveled way** The portion of the roadway intended for the movement of vehicles, exclusive of shoulders and lanes for parking, turning, and storage for turning.

**trips** Short trips are normally intracity. Long trips are normally interstate, regional, or interregional.

## 1425.04 Procedures

Figures 1425-1 and 2 list the project types most likely to affect freeway safety and operations, requiring the submission of an Interchange Justification Report. Figure 1425-3 lists project types least likely to require the submission of an IJR. Consult the HQ Access and Hearings Unit early in the process for specific direction.

Gaining concurrence and approval for an access point revision is a multistep process. The first step consists of a study. If the study shows that the purpose and need of the proposal cannot be achieved with improvements to the local infrastructure only, the next step would normally be an IJR. (See the IJR Flow Chart, Figure 1425-4.)

### (1) The First Step

Study the transportation systems in the area. This study will identify the segments of both the local and regional network that are currently experiencing congestion or safety deficiencies, or where planned land use changes will prompt the need to evaluate the demands on and the capacity of the transportation system. The study area includes the affected existing and proposed adjacent interchanges/intersections upstream and downstream from the proposed access point revision. If it is documented that the proposal creates no impacts to the adjacent interchanges/intersections, then analyze only through the

area of influence. When the area of influence extends beyond the one interchange upstream and downstream, extend the analysis far enough to include the extent of the traffic impacts.

Segments of the local and regional network within the study area will be evaluated for system improvements. Part of the study process is to identify local infrastructure needs and develop a proposal. The study must consider investments in local infrastructure improvements to meet the needs of the proposal, because those improvements may provide the desired solution.

During the study process and while developing a proposal, it is important to use the data and analysis methods required for an IJR. If the study indicates that an IJR is warranted, the study data can be utilized in the IJR. Establish a support team for the study. This same support team would also be involved with the IJR process if the study shows that either a revision or a new access point is needed to meet the proposal purpose and need. The support team normally consists of the following:

- FHWA Area Engineer for Interstate Projects
- Region's Design or Project Development Engineer or Designee
- HQ Assistant State Design Engineer
- HQ Access and Hearings Unit Engineer
- HQ Traffic Office Representative
- Representative From Local Agencies (city, county, port, or tribal government)
- Recorder

The support team is encouraged to call upon specialists as needed; for example:

- Metropolitan Planning Organization (MPO)
- Regional Transportation Planning Organization (RTPO)
- WSDOT Region
  - Planning
  - Design
  - Environmental
  - Maintenance
  - IJR writer

- WSDOT Headquarters
  - Design
  - Bridge
  - Traffic
  - Geotechnical
- Project Proponent Specialists
- Transit Agencies

The support team's role is to:

- Develop a charter that includes the processes for reaching agreement, resolving disputes, and assigning responsibility for final decisions when consensus is not reached.
- Develop purpose, need, and vision statements for the study. This should be consistent with the project environmental document.
- Expedite the study step (and, if needed, the IJR development and review process) through early communication and agreement.
- Agree on area of influence and travel assumptions for the study and, if an IJR is needed, for each of the alternatives being considered.
- Develop the access assumptions document.
- Provide guidance and support.
- Evaluate data and identify possible alternatives for the proposal during the study and, if needed, for an IJR.
- Contribute material for the report that documents the discussions and decisions.
- Review results and determine whether an IJR is warranted.
- Ensure the compatibility of data used in various studies.
- Ensure integration of the Project Definition process, Value Engineering studies, public involvement efforts, environmental analyses, operational analyses, safety analyses, other analyses for the study (and, if needed, to prepare an IJR). This encourages the use of consistent data.
- Address design elements. Status of known deviations must be noted in Policy Point 4. Deviations are discouraged on new accesses.

## **(2) The Second Step**

Prepare a detailed IJR using the guidance in 1425.05, "Interchange Justification Report and Supporting Analyses," and Figure 1425-4.

The IJR addresses eight specific policy topics. (See Figures 1425-1 and 2 for exceptions.) In order of presentation, the topics are:

1. Need for the Access Point Revision
2. Reasonable Alternatives
3. Operational and Accident Analyses
4. Access Connections and Design
5. Land Use and Transportation Plans
6. Future Interchanges
7. Coordination
8. Environmental Processes

The IJR is initiated early in the environmental process. Traffic analyses help define the area of impact and the range of alternatives. Since the traffic data required for the National Environmental Policy Act (NEPA) or the State Environmental Policy Act (SEPA) and the operational/safety analyses of the decision report are similar, these documents are usually developed together using the same data sources and procedures.

## **(3) The Third Step**

Concurrence and approval of a new or revised access point is based on the IJR. The IJR contains sufficient information about and evaluation/analysis of the proposal to provide assurance that the safety and operations of the freeway system are not adversely impacted.

The region, with the help of the support team, prepares the IJR and submits four draft copies, including backup traffic data, for review. For a final IJR submittal, contact the HQ Access and Hearing Unit for the necessary number of copies. All IJR's are submitted to the HQ Access and Hearings Unit for review. Interstate IJR's are submitted by Headquarters to FHWA for concurrence and approval.

Interstate access point revisions are reviewed by both Headquarters and FHWA. If they are found to be acceptable to FHWA, they are given a finding of engineering and operational acceptability. Some Interstate IJR's are reviewed and approved by the local FHWA Division Office. Other Interstate IJR's are reviewed and approved by the Federal Highway Administration in Washington, DC. Additional review time is necessary for reports that have to be submitted to Washington DC. (See Figure 1425-1.)

If the IJR is finalized prior to the completion of the environmental process, it can be submitted for concurrence. Concurrence with the proposed Interstate access point revision can be made by FHWA in the form of a finding of engineering and operational acceptability. Final IJR approval by FHWA is provided concurrently with the appropriate final environmental decision: ECS, FONSI, or ROD (see definitions). For non-Interstate routes, the Assistant State Design Engineer's approval is given concurrently with environmental approval. (See Figure 1425-4.)

### **1425.05 Interchange Justification Report and Supporting Analyses**

Begin the IJR with an executive summary. Briefly state what access point revision is being submitted for a decision and why the revision is needed. Include a brief summary of the proposal. Formatting for the IJR includes (1) providing numbered tabs in the decision report for the policy points and appendices, and (2) numbering all pages including references and appendices. A suggestion for page numbering is to number each individual section, such as "Policy Point 3, PP3-4" and "Appendix 2, A2-25." This allows for changes without renumbering the entire report. The IJR must be assembled in the policy point order noted in this chapter.

On the bottom left of each page, place the revision date for each version of the IJR. As an individual page is updated, this revision date will help track the most current version of that page. Also, include the title of the report on the bottom left of each page. The use of comb binding is not allowed.

The eight policy points, which apply to both urban and rural areas, are presented below. Guidance is provided for the most extreme condition—a new interchange in an urbanized area. The scope of the analyses and documentation need not be as extensive for more modest access point revisions. Factors that affect the scope include location (rural or urban), access points (new or revised), ramps (new or existing), and ramp terminals (freeway or local road).

#### **(1) Policy Point 1: Need for the Access Point Revision**

*What are the current and projected needs? Why are the existing access points and the existing or improved local system unable to meet the proposal needs? Is the anticipated demand short or long trip?*

Describe the need for the access point revision and why the existing access points and the existing or improved local system do not address the need. How does the proposal meet the anticipated travel demand? Provide the analysis and data to support the need for the access request.

(a) **Project Description.** Describe the needs being addressed and the proposal.

Demonstrate that improvements to the local transportation system and the existing interchanges cannot be improved to satisfactorily accommodate the design year travel demands. Describe traffic mitigation measures considered at locations where the level of service is (or will be) below service standards in the design year.

The access point revision is primarily to meet regional, not local, travel demands. Describe the local and regional traffic (trip link and/or route choice) benefiting from the proposal.

(b) **Analysis and Data.** The proposal analysis, data, and study area must be agreed upon by the support team. The assumptions document captures the specific items.

Show that a preliminary (planning level) analysis, comparing build to no-build (baseline) data, was conducted for the current year, year of opening, and design year, comparing baseline, no-build condition, and build alternatives. Include the following steps:

- Define the study areas. The study area normally includes one interchange upstream and downstream from the proposed system revision. If the proposal's area of influence extends beyond those interchanges, the study area will be expanded accordingly.
- Collect and analyze current traffic volumes to develop current year, year of opening, and design year peak hour traffic estimates for the regional and local systems in the area of the proposal. Use regional transportation planning organization-based forecasts, refined by accepted travel demand estimating procedures. Forecasts for specific ramp traffic can require other methods of estimation procedures and must be consistent with the projections of the travel demand models. Modeling must include increased demand caused by anticipated development.
- Using existing information, identify the origins and destinations of trips on the local systems, the existing interchange/intersections, and the proposed access.
- Assign the appropriate travel demand to improvements that might be made to:
- The local system (widen, add new surface routes, coordinate the signal system, control access, improve local circulation, or improve parallel roads or streets).
- The existing interchanges (lengthen or widen ramps, add park and ride lots, or add frontage roads).
- The freeway lanes (add collector-distributor roads or auxiliary lanes).
- Transportation system management and travel demand management measures.
- Describe the current, year of opening, and design year level of service at all affected locations within the study area, including local systems, existing ramps, and freeway lanes.

## **(2) Policy Point 2: Reasonable Alternatives**

*Describe the reasonable alternatives that have been evaluated.*

Describe all reasonable alternatives that have been considered: the design options, locations, and transportation system management-type improvements such as ramp metering, mass transit, and HOV facilities that have been assessed and that meet the proposal design year needs.

After describing each of the alternatives that were proposed, explain why reasonable alternatives were omitted or dismissed from further consideration.

Future projects must be coordinated as described in Policy Point 7.

## **(3) Policy Point 3: Operational and Accident Analyses**

*How will the proposal affect safety and traffic operations at year of opening and design year?*

Policy Point 3 documents the procedures used to conduct the operational and accident analyses and the results that support the proposal.

The preferred operational alternative is selected, in part, by showing that it will not have a significant adverse impact on the operation and safety of the freeway and the affected local network, or that the proposal impacts will be mitigated.

Document the results of the following analyses in the report:

- “No-Build” Analysis – An operational analysis of the current year, year of opening, and design year for the existing limited access freeway and the affected local roadway system. This is the baseline “no-build” condition, including state transportation plan and comprehensive plan improvements expected to exist. All of the alternatives will be compared to the no-build condition.
- “Build” Analysis – An operational analysis of the year of opening and design year for the proposed future freeway and the affected local roadway system.

- An accident analysis for the most current data year, year of opening, and design year of the existing limited access freeway and the affected local roadway system for the “no-build.” An accident analysis should also be performed for the “build” as well.

The data used must be consistent with the data used in the environmental documentation. If not, provide justification for the discrepancies.

(a) **Operational Analyses.** Demonstrate that the proposal does not have a significant adverse impact on the operation of the freeway or the adjacent affected local roadway system. If there are proposal impacts, explain how the impacts will be mitigated.

Document the selected operational analysis procedures. For complex urban projects, a refined model might be necessary. As a minimum, an analysis using the current version of the latest accepted *Highway Capacity Manual* (HCM) is necessary. Any procedure used must provide a measure of effectiveness compatible with the HCM. WSDOT currently supports the following traffic analysis and traffic simulation software:

- HCS
- Synchro
- Vissim
- Corsim

Refer to *Design Manual* Chapter 610, “Highway Capacity,” for more detail.

FHWA must conduct its independent analysis using HCS. In those instances where HCS is not the appropriate tool to use and a simulation-type software is chosen, early coordination with FHWA is necessary.

All operational analyses shall be of sufficient detail, and include sufficient data and procedure documentation to allow independent analysis during FHWA and HQ evaluation of the proposal. For Interstates, HQ must provide concurrence before it transmits the proposal to FHWA with its recommendation.

Prepare a layout displaying adjacent interchanges/intersections and the data noted below. The data should show:

- Distances between intersections or ramps of a proposed interchange, and that of adjacent existing and known proposed interchanges.
- Design speeds.
- Grades.
- Truck volume percentages on the freeway, ramps, and affected roadways.
- Adjustment factors (such as peak hour factors).
- Affected freeway, ramp, and local roadway system traffic volumes for the “no-build” and each “build” option. This will include: A.M. and P.M. peaks (noon peaks, if applicable); turning volumes; average daily traffic (ADT) for the current year; and forecast ADT for year of opening and design year.
- Affected main line, ramp, and local roadway system lane configurations.

The study area of the capacity analysis on the local roadway system includes documenting that the local network is able to safely and adequately collect and distribute any new traffic loads resulting from the access point revision. Expand the limits of the study area, if necessary, to analyze the coordination required with an in-place or proposed traffic signal system. Record the limits of the analysis as well as how the limits were established in the project assumptions document.

Document the results of analyzing the existing access and the proposed access point revision at all affected locations within the limits of the study area, such as weave, merge, diverge, ramp terminals, accident sites, and HOV lanes; along the affected section of freeway main line and ramps; and on the affected local roadway system. In the report, highlight the following:

- Any location for which there is a significant adverse impact on the operation or safety of the freeway facility, such as causing a reduction of the operational efficiency of a merge condition at an existing ramp; introducing a weave; or significantly reducing the level of service on the main line due to additional travel demand. Note what will be done to mitigate this adverse impact.



- Any location where a congestion point will be improved or eliminated by the proposal, such as proposed auxiliary lanes or collector-distributor roads for weave sections.
- Any local roadway network conditions that will affect traffic entering or exiting the freeway. If entering traffic is to be metered, explain the effect on the connecting local system (for example, vehicle storage).
- When the existing local and freeway network does not meet the desired level of service, show how the proposal will improve the level of service or keep it from becoming worse than the no-build condition in the year of opening and the design year.

(b) **Accident Analysis.** The Accident Analysis identifies areas where there may be a safety concern. The study limits are the same as for operational analyses.

Identify and document all safety program (I2) locations. Identify and document accident histories, rates, and types for the freeway section and the adjacent affected local surface system. Project the rates that will result from traffic flow and geometric conditions imposed by the proposed access point revision. Document the basis for all assumptions.

Demonstrate (1) that the proposal does not have a significant adverse impact on the safety of the freeway or the adjacent affected local surface system, or (2) that the impacts will be mitigated. The safety analysis for both existing and proposed conditions should include the following:

1. Type of Accidents
  - What types of accidents are occurring (overturns, rear-ends, enter-at-angle, hitting fixed object)?
  - What types of accidents are most prevalent?
  - Are there any patterns of accident type or cause?
2. Severity of Accidents (fatalities, disabling, evident injuries, property damage)

### 3. Accident Rates and Numbers

- Document the number and rate of accidents within the study limits for existing and proposed conditions.
- What are the existing and anticipated crash/serious injury/fatality rates and numbers by proximity to the interchange exit and entrance ramps?
- How do these rates compare to similar corridors or interchanges?
- How do these rates compare to the future rates and numbers?
- What are the existing and anticipated crash/serious injury/fatality rates and numbers for the impacted adjacent and parallel road system (with and without the access revision)?

### 4. Contributing Factors and Conclusions

- Document contributing causes of accidents and conclusions. What are the most prevalent causes?
- Evaluate and document the existing and proposed roadway conditions for geometric design standards, stopping sight distance and other possible contributing factors. Would the proposal reduce the frequency and severity of accidents?

## (4) Policy Point 4: Access Connections and Design

*Will the proposal provide fully directional interchanges connected to public streets or roads, spaced appropriately, and designed to full design level geometric control criteria?*

Wherever possible, provide for all directions of traffic movement. The intent is to provide full movement at all interchanges, whenever possible. Partial interchanges are discouraged. Less than fully directional interchanges for special-purpose access for transit vehicles, for HOVs, or to or from park-and-ride lots, will be considered on a case-by-case basis.

A proposed new or revised interchange access must connect to a public freeway, road, or street and be endorsed by the local governmental agency or tribal government having jurisdiction over said public freeway, road, or street.

Explain how the proposed access point relates to present and future proposed interchange configurations and the *Design Manual* spacing criteria. Note that urban and rural interchange spacing for crossroads also includes additional spacing requirements between the noses of adjacent ramps, as noted in Chapter 940.

Develop the proposal in sufficient detail to conduct a design and operational analysis. Include the number of lanes, horizontal and vertical curvature, lateral clearance, lane width, shoulder width, weaving distance, ramp taper, interchange spacing, and all traffic movements. This information is presented as a sketch or a more complex layout, depending on the complexity of the proposal.

The status of all known or anticipated project deviations must be noted in this policy point, as described in Chapter 330.

#### **(5) Policy Point 5: Land Use and Transportation Plans**

*Is the proposed access point revision compatible with all land use and transportation plans for the area?*

Show that the proposal is consistent with local and regional land use and transportation plans. Before final approval, all requests for access point revisions must be consistent with the metropolitan and/or statewide transportation plan, as appropriate. (See Chapter 120.) The proposed access point revision will affect adjacent land use and, conversely, land use will affect the travel demand generated. Therefore, reference and show compatibility with the land use plans, zoning controls, and transportation ordinances in the affected area.

Explain the consistency of the proposed access point revision with the plans and studies, the applicable provisions of 23 CFR Part 450, and the applicable transportation conformity requirements of 40 CFR Parts 51 and 93.

If the proposed access is not specifically referenced in the transportation plans, define its consistency with the plans and indicate the process for the responsible planning agency to incorporate the project. In urbanized areas, the plan refinement must be adopted by the metropolitan planning organization (MPO) before the project is designed. The action must also be consistent with the *State Transportation Plan*.

#### **(6) Policy Point 6: Future Interchanges**

*Is the proposed access point revision compatible with a comprehensive network plan? Is the proposal compatible with other known new access points and known revisions to existing points?*

The report must demonstrate that the proposed access point revision is compatible with other known new access points and known revisions to existing points.

Reference and summarize any comprehensive freeway network study, plan refinement study, or traffic circulation study.

Explain the consistency of the proposed access point revision with those studies.

#### **(7) Policy Point 7: Coordination**

*Are all coordinating projects and actions programmed and funded?*

When the request for an access point revision is generated by new or expanded development, demonstrate appropriate coordination between the development and the changes to the transportation system.

Show that the proposal includes a commitment to complete the other noninterchange/nonintersection improvements that are necessary for the interchange/intersection to function as proposed. For example, if the local circulation system is necessary for the proposal to operate, it must be in place before new ramps are opened to traffic. If future reconstruction is part of the mitigation for design year level of service, the reconstruction projects must be in the *State Highway System Plan*.

All elements for improvements are encouraged to include a fiscal commitment and an anticipated time for completion. If the project is to be constructed in phases, it must be demonstrated in Policy Point 3 that each phase can function independently and does not affect the safety and operational efficiency of the freeway. Note the known funding sources, the projected funding sources, and the estimated time of completion for each project phase.

### **(8) Policy Point 8: Environmental Processes**

*What is the status of the proposal's environmental processes? This section should be something more than just a status report of the environmental process; it should be a brief summary of the environmental process.*

All requests for access point revisions on freeways must contain information on the status of the environmental approval and permitting processes.

The following are just a few examples of environmental status information that may apply:

- Have the environmental documents been approved? If not, when is the anticipated approval date?
- What applicable permits and approvals have been obtained and/or are pending?
- Are there hearings still to be held?
- Is the environmental process waiting for an engineering and operational acceptability decision?

### **1425.06 Documentation**

A list of documents that are to be preserved in the Design Documentation Package (DDP) or the Project File (PF) can be found on the following web site:

<http://www.wsdot.wa.gov/EESC/Design/projectdev/>

Project Type	Support Team	Policy Point								Concurrence	Approval
		1	2	3	4	5	6	7	8		
Interstate Routes											
New freeway-to-crossroad interchange in a Transportation Management Area <sup>(1)</sup>	Yes	✓	✓	✓	✓	✓	✓	✓	✓	FHWA and HQ	FHWA DC
New partial interchange	Yes	✓	✓	✓	✓	✓	✓	✓	✓	FHWA and HQ	FHWA DC
New HOV direct access	Yes	✓	✓	✓	✓	✓	✓	✓	✓	FHWA and HQ	FHWA DC
New freeway-to-freeway interchange	Yes	✓	✓	✓	✓	✓	✓	✓	✓	FHWA and HQ	FHWA DC
Revision to freeway-to-freeway interchange in a Transportation Management Area <sup>(1)(2)</sup>	Yes	✓	✓	✓	✓	✓	✓	✓	✓	FHWA and HQ	FHWA DC
New freeway-to-crossroad interchange not in a Transportation Management Area <sup>(1)</sup>	Yes	✓	✓	✓	✓	✓	✓	✓	✓	HQ	FHWA
Revision to freeway-to-freeway interchange not in a Transportation Management Area <sup>(1)(2)</sup>	Yes	✓	✓	✓	✓	✓	✓	✓	✓	HQ	FHWA
Revision to interchange <sup>(2)(3)</sup>	Yes	✓	✓	✓	✓	✓	✓	✓	✓	HQ	FHWA
Revision to existing interchange—no adverse impacts to main line	No	(6)	(6)	✓	✓	(6)	(6)	(6)	(6)	HQ	FHWA
Transit flyer stop on main line	Yes	✓	✓	✓	✓	✓	✓	✓	✓	HQ	FHWA
Transit flyer stop on an on-ramp	No			✓	✓					HQ	FHWA
Addition of entrance or exit ramps that complete basic movements at an existing interchange	Yes	✓	✓	✓	✓	✓	✓	✓	✓	HQ	FHWA
Abandonment of a ramp <sup>(4)</sup>	Yes	✓	✓	✓	✓	✓	✓	✓	✓	HQ	FHWA
Locked gate <sup>(7)</sup>	No	✓			(5)					HQ	FHWA
Access breaks that do not allow any type of access to main line or ramps	No	✓	✓		(5)					HQ	FHWA
Pedestrian structure	No	✓			(5)					HQ	FHWA
Construction/emergency access break	No	✓	✓	✓	✓					Region	FHWA

**Notes:**

- (1) In Washington, designated Transportation Management Areas include Clark, King, Kitsap, Pierce, Snohomish, and Spokane Counties.
- (2) "Revision" includes changes in interchange configuration, even though the number of access points does not change. Changing from a cloverleaf to a directional interchange is an example of a "revision." If the revision does not add new lanes and can be shown to have no adverse impacts, and the spacing and geometric control criteria requirements will be met, a modified IJR will be the acceptable document, meaning fewer than the eight policy points will be required. Consult the HQ Access and Hearings Unit for direction.
- (3) Revisions that might adversely affect the level of service of the through lanes. Examples include: doubling lanes for an on-ramp with double entry to the freeway; adding a loop ramp to an existing diamond interchange, replacing a diamond ramp with a loop ramp. If the revision does not have adverse impacts to the Interstate main line, and the spacing and geometric control criteria requirements will be met, a modified IJR will be the acceptable document.
- (4) Unless it is a condition of the original approval.
- (5) Update the right-of-way/limited access plan as necessary.
- (6) If the results of the operational analysis show an adverse impact to the main line, the remaining policy points must be fully, not briefly, addressed.
- (7) As part of Policy Point 1, include a narrative stating that all other alternatives are not feasible.

**Interstate Routes – Interchange Justification Report Content and Review Levels**

Figure 1425-1

Project Type	Support Team	Policy Point								Concurrence	Approval
		1	2	3	4	5	6	7	8		
Non-Interstate Routes											
New freeway-to-crossroad interchange on a predominately grade-separated corridor	Yes	✓	✓	✓	✓	✓	✓	✓	✓	Region	HQ
New freeway-to-freeway interchange	Yes	✓	✓	✓	✓	✓	✓	✓	✓	Region	HQ
Revision to freeway-to-freeway interchange	Yes	✓	✓	✓	✓	✓	✓	✓	✓	Region	HQ
New freeway-to-crossroad interchange on a predominately at-grade corridor	No			✓	✓					Region	HQ
Revision to interchange <sup>(1)</sup>	No			✓	✓					Region	HQ
Addition of entrance or exit ramps that complete basic movements at an existing interchange	No			✓	✓					Region	HQ
Abandonment of a ramp <sup>(2)</sup>	No			✓						Region	HQ
Locked gate <sup>(4)</sup>	No	✓			(3)					Region	HQ
Pedestrian structure	No	✓			(3)					Region	HQ
Construction/emergency access break	No	✓	✓	✓						Region	HQ

**Notes:**

- (1) Revisions that might adversely affect the level of service of the through lanes. Examples include: doubling lanes for an on-ramp with double entry to the freeway, adding a loop ramp to an existing diamond interchange, and replacing a diamond ramp with a loop ramp. If the revision does not have adverse impacts to the main line, and the spacing and geometric control criteria requirements will be met, a modified IJR will be the acceptable document.
- (2) Unless it is a condition of the original approval.
- (3) Update the right-of-way/limited access plan as necessary.
- (4) As part of Policy Point 1, include a narrative stating that all other alternatives are not feasible.

**Non-Interstate – Interchange Justification Report Content and Review Levels**  
Figure 1425-2

**Interstate actions that *may not* require an IJR or FHWA action.**

<b>Project Type</b>	<b>Examples/Comments</b>
Minor revision to existing freeway-to- freeway interchange	To bring to standard
Increasing the length of an exit ramp deceleration lane or entrance ramp acceleration lane	To meet current geometric control criteria
Relocating entrance or exit ramp gore points along the main line	
Adding an auxiliary lane between two adjacent interchange ramps	
Ramp terminal revision at the terminal connection with the crossroad, with no effect to the main line lanes of the interstate.	New turn pocket(s), through lane(s), signalization, roundabout(s)
Converting a one-lane ramp to two lanes with no effect on the through lanes of the Interstate	If there are impacts to the main line, an IJR is required. Contact the HQ Access and Hearings Unit for direction.
Transit flyer stops near the ramp terminals of on-ramps	

**Complete Policy Point 3 first for all proposals.** If Policy Point 3 shows impacts to the main line, complete the remaining Policy Points.

**Notes:**

The table above shows some, but not all, of the types of access revisions that normally do not require an Interchange Justification Report.

All changes to limited access routes must receive the approval of the Assistant State Design Engineer.

All access changes on Interstate routes must be approved by FHWA.

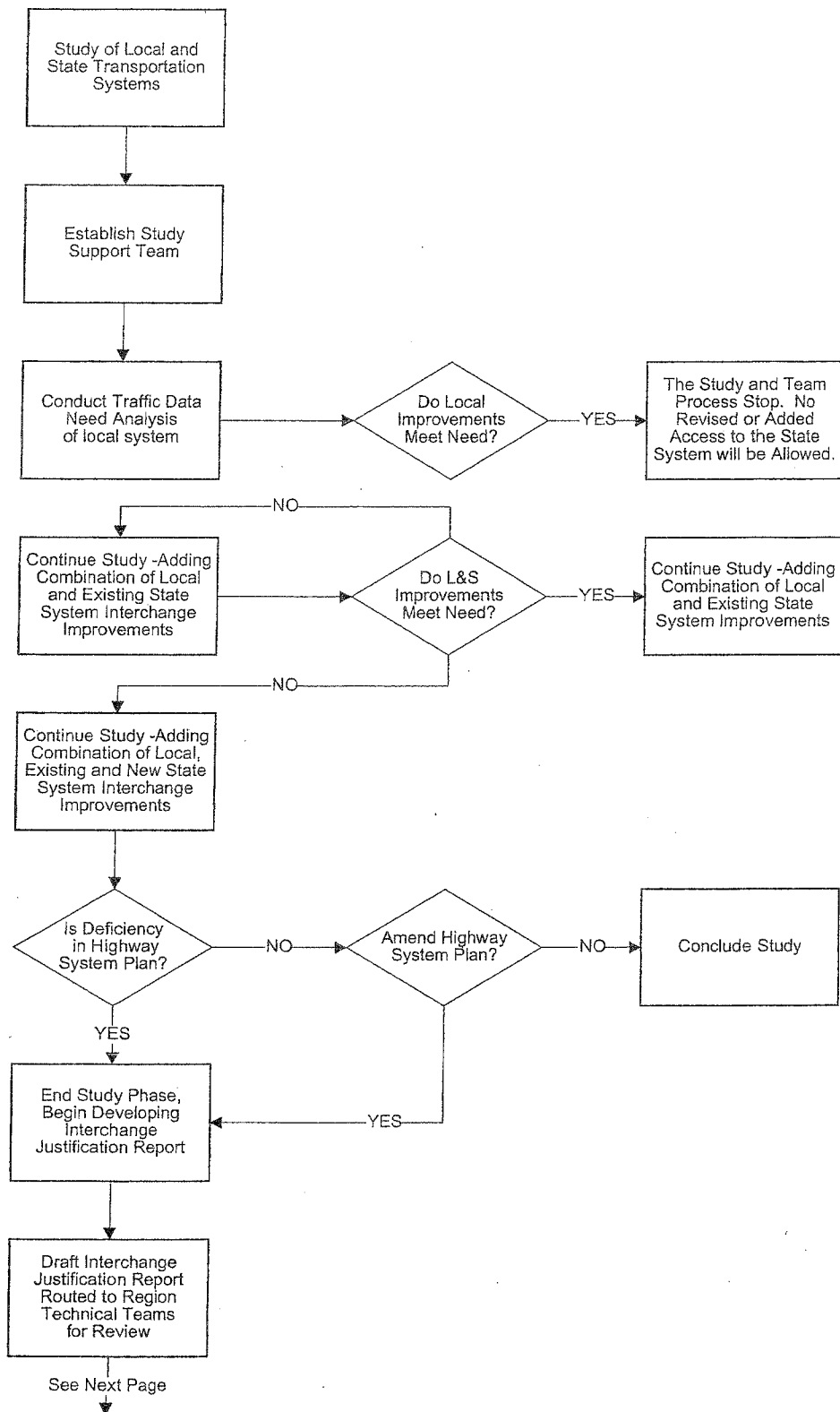
If the following conditions are met, the proposal may be considered under lesser documentation:

- A traffic analysis documents that there will be no adverse impact to the freeway main line.
- The data used is consistent with the data used in the environmental analyses.
- The access is designed to the design level required by the appropriate Design Matrix.
- Access spacing meets requirements in Chapter 940.
- The project is approved per Chapter 330 as part of the Project Summary approval process.

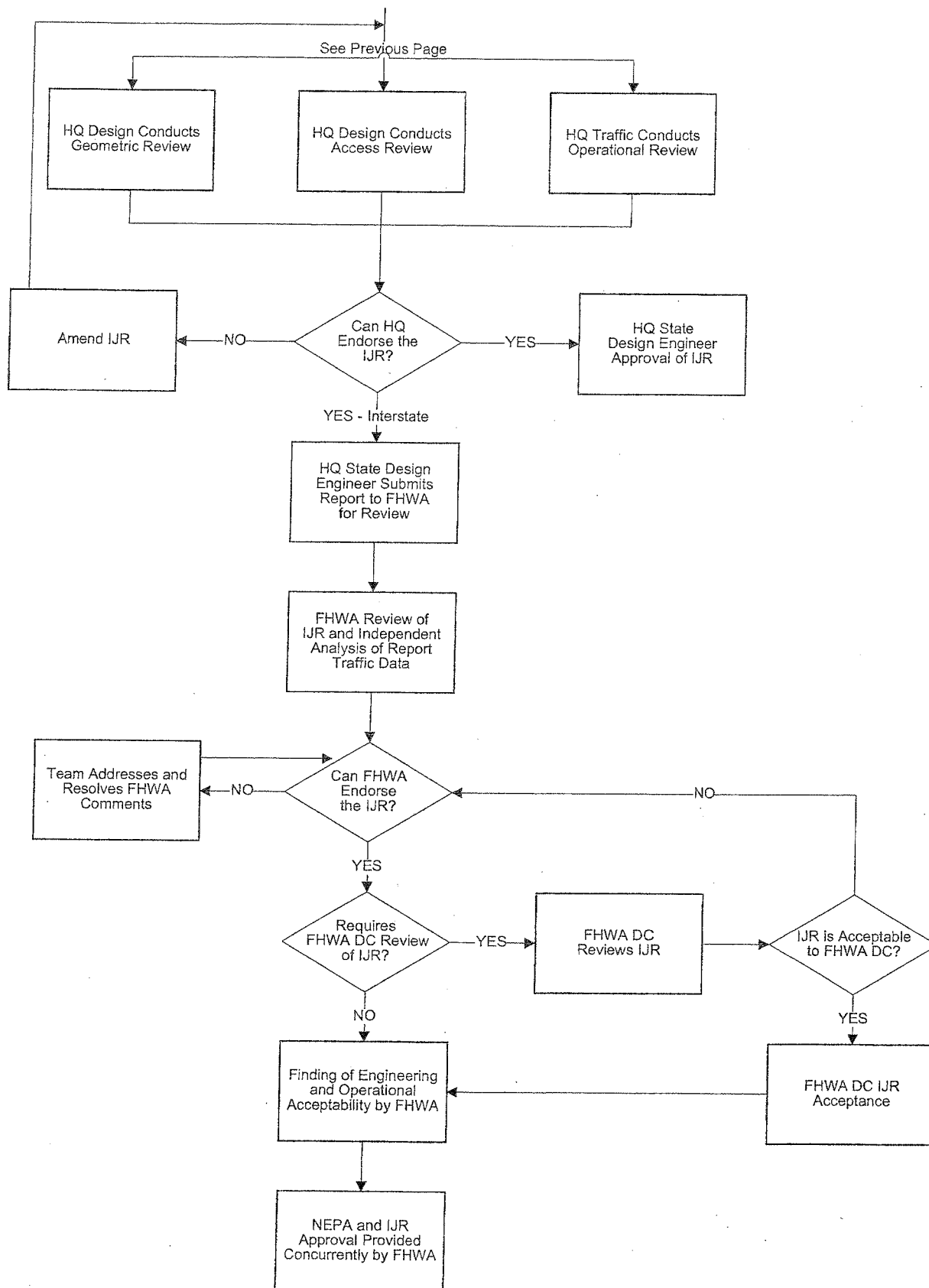
The omission of the IJR is justified in the Design Documentation Package, with a copy sent to the state Access and Hearings Engineer after the Assistant State Design Engineer has concurred in writing. If Interstate, FHWA must concur.

**Interchange Justification Report Possibly Not Required**

*Figure 1425-3*



**Interchange Justification Report Process Flow Chart**  
 Figure 1425-4



**Interchange Justification Report Process Flow Chart**  
*Figure 1425-4 Continued*



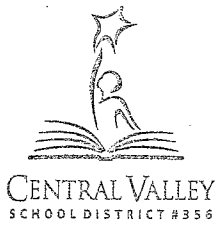
**Response to Greg Figg, Transportation Planner, WA Department of Transportation:**

**(Note: Comment e-mail refers to "annexation". The DEIS was prepared to study UGA boundary extension, not annexation)**

**1) The DEIS does not attempt an environmental review of all transportation alternatives and mitigating measures. Such detailed analysis may be considered as part of the annual updates of the City and County 6-Year Transportation Improvement Plans, as individual improvement projects are undertaken, and upon application of specific projects so appropriate actions can be taken at that time.**

**The DEIS does not attempt to, nor is it required to, put forward every possible impact or mitigation measure, nor does it guarantee that the mitigation measures that are presented will be implemented.**

**The DEIS broadly examines the impacts of a range of strategies for accommodating projected growth. This is a Non-project DEIS, and the concerns of the writer cannot be addressed until and if specific project applications are received. Further environmental review will occur at that time.**



19307 EAST CATALDO  
SPOKANE VALLEY, WA 99016  
(509) 228-5400

December 5, 2006

DEIS Comments  
City of Liberty Lake  
Planning and Community Development Department  
22710 E. Country Vista Drive  
Liberty Lake, WA 99019

Attn: Doug Smith

Dear Mr. Smith:

Thank you for the opportunity to comment on the Draft Environment Impact Statement (DEIS) addressing options for changing the City of Liberty Lake's Urban Growth Area (UGA).

### **General Comment**

Expansion of the City of Liberty Lake's UGA may place the district's third high school site, located at the southwest corner of Henry Road and 16<sup>th</sup> Avenue (extended) within the UGA. The district expects to need to use this site within a few years. Its inclusion in a UGA would benefit the school district because utilities would be more readily available to the site.

Other than the potential inclusion of the reserve school site in a UGA, expansion of the City of Liberty Lake's UGA, in itself, should have little immediate effect on the school district. We expect impact in the longer term, however, because expansion of the UGA facilitates future residential development, at urban densities, within the new UGA. The school district will comment on specific development proposals as they are advanced.

In general, Central Valley School District should be able to serve students at current levels of service until fall 2008. We expect that additional school facilities will be required to maintain current levels of service for enrollment expansion beyond that time.

000714

**Specific Comment: DEIS**

The City of Liberty Lake's Urban Growth Area Boundary Alternatives DEIS addresses public schools in sections 3.3.17 through 3.3.19. Central Valley School District's comment on material contained in these sections is shown below.

**Page 3-14**

**Section 3.3. Central Valley School District**

**Comment:**

1) Central Valley School District is cited as the source of this table. The district has not been able to locate this table in its records. -2

2) Existing capacity figures for permanent facilities were provided by Central Valley School District as part of the district's Capital Facilities Plan. These figures reflect school capacities of record when the Plan was being drafted. Due to subsequent changes in contractual maximum class sizes and in location of specialized instructional programs, these capacity figures may no longer be current. The school district has, for example, changed the use of the Barker Center building, the Summit School building and the Keystone building since these figures were developed. The DEIS table on page 3-14 does not appear to include Barker Center, Summit School or Keystone Center capacity figures. The district has also recently relocated various other programs or classes to best utilize available space. } 3

3) The DEIS table shows capacity of interim (portable) facilities. The school district does not recall having provided these figures. They appear to be based on the assumption that each portable classroom within the school district can house approximately 21 students. } 2

4) The table states that Central Valley School District's grade organization is K-6, 7-8 and 9-12. The district's grade organization is, in fact, K-5, 6-8 and 9-12. -4

**Page 3-15**

**Section 3.3 Central Valley School District**

**Comment:**

1) Central Valley School District is cited as the source of the table at the top of page 3-15. The district has not been able to locate this table in its records. -2

2) There appears to be a typographical error in the first figure, 6350 – shown in column 3. -5

3) 2006 "enrollment actual" figures shown in Column 2 do not correspond with the district's October 2006 FTE enrollment figures. -2

4) The source of the 2006-2011 enrollment growth figures shown is unclear. -3

5) The table states that, as a capacity project, the district plans to replace Evergreen Middle School before 2011. There is no such plan. -6

6) There appears to be a typographical error in the Column 1, "middle school total" row. -7

**Page 3-16**

**Section 3.3.1.7.2 School Impact Fees**

"...The City of Liberty Lake is... proposing to collect impact fees for needed school facilities."

For some months the city has considered, but not yet adopted, an addition to the Liberty Lake City Code implementing school impact fees.

**Page 3-16, 3-17**

**Section 3.3.1.8 Impacts**

The city recognizes that if the UGA boundary is expanded, land will be rezoned from rural density to urban densities. The city also recognizes that additional public school facilities will be required to maintain adequate service levels under all UGA scenarios, including Alternative 1.

**Page 3-17**

**Section 3.3.1.9 Public Schools – Mitigating Measures**

**General Comment**

Expansion of the City of Liberty Lake UGA, per se, should have little effect on Central Valley School District. As such, no school mitigation measures should be needed related solely to UGA expansion. We assume that mitigation measures suggested by the city in this section of the DEIS anticipate subsequent urban density residential development which will occur within the expanded UGA, and which will produce students beyond what Central Valley School District can adequately serve, given current facilities.

It is typically the proponent, not the affected parties, who is responsible for mitigating effects of proposed development.

The DEIS suggests six measures to mitigate the potential impact on public schools of expanding enrollment potentially associated with the UGA proposals being considered. Five of the six suggested mitigations place the burden of mitigating school impact of future residential growth on the school district, rather than on the future developer(s) of residential property within the UGA. These mitigation measures ask that the school district "work with", "examine" and "seek approval". None of these actions on the part of the district can ensure school facilities which maintain Central Valley School District's level of service in the face of substantial residential development and resultant enrollment growth.

Principal responsibility for assuring adequate public schools prior to approving residential development rests with the approving jurisdiction, not with the school district. When responding to proposals for future residential development, Central Valley School District expects to highlight the jurisdiction's responsibility as paraphrased below:

RCW 58.17.110(1) and (2) require that jurisdictions determine if appropriate provisions for schools and school grounds have been made, and that these findings be put in writing before residential development is approved.

Washington State's Growth Management Act requires that the land use element of the approving jurisdiction's Capital Facilities Plan be reassessed if probable funding for capital facilities is insufficient (WAC 365-195-315 (1)(e) and WAC 365-195-315 (2)(f). Further, the Act requires that the jurisdiction prepare written findings that appropriate provisions have been made for schools and school grounds (WAC 365-195-825(4)(a)).

Spokane County's Comprehensive Plan states that development shall be approved only after it is determined that public facilities and services will have capacity to serve the development without decreasing levels of service (Section CF.3.1) and that adequate schools will be provided to support development concurrent with impacts of such development (Section CF.3.5).

The City of Liberty Lake Capital Facilities Plan (2005.5-2011), referencing Growth Management Act guidelines, (p.2), requires that public facilities be adequate without decreasing current levels of service to serve development at the time development is ready for occupancy and that the city work with Central Valley School District to ensure that such services are coordinated and made available in a timely manner in areas annexed to the city (p. 7, Obligation to Provide Capital Facilities).

### **Specific Comment**

#### **Mitigation Measure 1**

The City suggests that Central Valley School District should "examine", "monitor" and "take a proactive stance"...

The district, with the help of Spokane County and citizen's groups, the most recent of which included representatives from the City of Liberty Lake, has "examined and monitored". The district has produced and forwarded to the City of Liberty Lake a Capital Facilities Plan prepared in accord with provisions of the GMA. The district has sought approval of three capital funding measures since 2003. The district has repeatedly alerted

the City of Liberty Lake to the district's projected inability to maintain current levels of service beyond August 2008.

#### Mitigation Measure 2

"The Central Valley School District should work with the City of Liberty Lake and Spokane County Planning Departments to ensure consistency..."

Since 2003, representatives of both the city and the county have been invited to participate in the school district's planning efforts. They have done so. The school district has prepared and forwarded its Capital Facilities Plan to both the City of Liberty Lake and Spokane County. Based on recent growth, the school district has made its diminishing ability to house future students known to both the city and county verbally and via letter.

The school district has not been successful to date in "ensuring" that either the City of Liberty Lake or county effectively provide for adequate schools. A city representative recently stated in a public meeting regarding UGA alternatives that the city is not "required" to condition UGA action, potentially resulting in substantial residential growth, on the needs of public schools.

#### Mitigation Measure 3.

"School districts should seek approval of (funding measures) to address major school facility needs."

After working with community representatives, Central Valley has attempted three times since 2003 to secure approval of funding for capacity projects. None of the three proposals received the required 60% supermajority support. Seeking approval of capital funding measures does not improve the district's ability to serve new students when such measures are not approved by the community.

#### Mitigation Measure 4

"School districts should examine the possibility of... smaller schools... which could decrease the cost of ... bus service..."

It is unclear to the school district how a presumably larger number of smaller schools, as opposed to a smaller number of larger schools, would increase the district's capacity to serve students.

The DEIS suggests that smaller, neighborhood schools might result in lower bussing costs. The district suspects that this is correct. Cost of bussing, much of which is paid by the State of Washington, is however, not the issue at hand. Overall capacity to serve students is the school district's primary concern.

Smaller schools require more school sites. The district's recent experience is that acquiring suitable school sites is difficult and expensive. Smaller schools are also less financially efficient on a "cost per student" basis because each school requires certain fixed costs, including an administrator and specialized support staff. Incrementally higher fixed operating costs associated with small schools are not supported by the state.

#### Mitigation Measure 5

"Adoption of a school impact fee program..."

Central Valley School District is not empowered to adopt a school impact fee program. The district must rely on governmental jurisdictions to do so in the district's behalf.

The district has formally requested such action on the part of all three governmental jurisdictions it serves. The City of Liberty Lake has indicated conceptual support for school impact fees but, to date, has not adjusted the Liberty Lake City Code to implement such fees on behalf of Central Valley School District.

Spokane County and the City of Spokane Valley have not acted on the district's request.

#### Mitigation Measure 6

"School districts should examine ways to maximize use of existing school facilities, such as (double shifting) ... "

Central Valley School District is examining, and implementing, means of maximizing use of existing facilities. Absent additional school facilities, several alternatives for facilities use, including double shifting, will reduce the level of service the district can offer to its students.

Spokane County's Comprehensive Plan requires that development shall be approved only after it is determined that facilities, including schools, will be able to serve the development without decreasing levels of service. The City of Liberty Lake Capital Facilities Plan requires that public facilities be adequate, without decreasing levels of service, to serve development at the time development is ready for occupancy.

Central Valley School District appreciates the opportunity to comment on the City of Liberty Lake Urban Growth Area Boundary Alternatives DEIS. Please contact me if you desire additional comment or clarification of the district's remarks.

Sincerely,



Dave Jackman  
Director, Auxiliary Services  
509.228.5411

**Response to Dave Jackman, Director, Auxiliary Services, Central Valley School District  
#356:**

- 1) Not a comment on the adequacy of the DEIS, but rather a comment on the fact the expansion of the UGA would have little immediate effect on the school district itself.
- 2) Information and tables in Section 3.3.1.7 Central Valley School District were compiled from the Capital Facilities Plan 2005-06 through 2010-11, 2006.
- 3) Add the following to the DEIS page 3-14 after Table 3.3 Central Valley School District: "Existing capacity figures for permanent facilities were provided by CVSD as part of the district's Capital Facility Plan. These figures reflect school capacities of record when the plan was being drafted. Due to subsequent changes in contractual maximum class sizes and in location of specialized instructional programs, these capacity figures may no longer be current. The district has recently relocated various other programs or classes to best utilize space."

Add the following to the DEIS page 3-14 Table 3.3 Central Valley School District:  
Barker Center, Summit School, and Keystone Center.

- 4) Change the following in the DEIS page 3-14 Table 3.3 Central Valley School District to reflect CVSD grade organization of K-5, 6-8, and 9-12.
- 5) Change the following typographical error in the DEIS page 3-14 Table 3.3 Central Valley School District to reflect actual Elementary Existing Capacity of 6360.
- 6) Change the following in the DEIS page 3-15 Table 3.3 Central Valley School District to reflect a remodel of Evergreen Middle School as opposed to a replacement of the Evergreen MS.
- 7) Change the following in the DEIS page 3-15 Table 3.3 Central Valley School District to reflect "Total as of 2011" as opposed to "Total as of 2001".
- 8) Not a comment on the adequacy of the DEIS
- 9) The DEIS does not attempt to, nor is it required to, put forward every possible impact or mitigation measure, nor does it guarantee that the mitigation measures that are presented will be implemented. Detailed analysis of impacts and implementation of mitigation measures will take place upon application of specific projects so appropriate actions can be taken at that time.





11707 E Sprague Ave Suite 106 ♦ Spokane Valley WA 99206  
509.921.1000 ♦ Fax: 509.921.1008 ♦ cityhall@spokanevalley.org

## Fax

To: Doug Smith  
Fax: 509-755-6713  
Phone: \_\_\_\_\_  
Re: Draft EIS

From: Inga Note  
Pages: 2  
Date: 12/8/06 3:50 pm  
CC: \_\_\_\_\_

Letter will also be sent via email.



11707 E Sprague Ave Suite 106 ♦ Spokane Valley WA 99206  
509.921.1000 ♦ Fax: 509.921.1008 ♦ cityhall@spokanevalley.org

December 8, 2006

Doug Smith, Director of Planning & Community Development  
City of Liberty Lake  
22710 E. Country Vista Drive  
Liberty Lake, WA 99019

Re: Draft comments for Liberty Lake DEIS

Dear Mr. Smith,

The City of Spokane Valley has the following comments on the Draft EIS.

The transportation analysis was conducted without coordination with adjacent jurisdictions. The mitigation recommendations lack supporting traffic data, an explanation of methodology, and documentation of the analysis. Development within any of the proposed UGA boundaries will result in traffic impacts on Spokane Valley arterials such as Barker Road, Euclid Avenue, SR-290, Mission Avenue, Sprague Avenue, 8<sup>th</sup> Avenue and Appleway Avenue, yet there is no evaluation of these impacts in the study.

The mitigation recommendation to reconstruct the partial I-90 Greenacres Interchange to a full interchange with a 5-lane bridge has not been approved by WSDOT and FHWA. The study should also analyze the traffic impacts to the I-90 Barker Interchange, Barker Road, Mission Avenue, 8<sup>th</sup> Avenue, Sprague Avenue, and Appleway Avenue within Spokane Valley assuming the Greenacres Interchange cannot be modified.

UGA Alternatives #2 and #3 include property bound by the Spokane Valley City Limits, the Spokane River, Euclid Avenue, and Harvard Road. The traffic mitigations include no improvements to Euclid Avenue within Liberty Lake, and no evaluation of impacts to Spokane Valley roads such as Barker, Euclid, and the SR 290/Barker intersection.

Sincerely,

A handwritten signature in black ink, appearing to read "Neil Kersten", with a stylized flourish at the end.

Neil Kersten, ALA  
Public Works Director

**Response to Neil Kersten, AIA, Public Works Director, City of Spokane Valley:**

**The DEIS does not attempt an environmental review of all transportation alternatives and mitigating measures. Such detailed analysis may be considered as part of the annual updates of the City and County 6-Year Transportation Improvement Plans, as individual improvement projects are undertaken, and upon application of specific projects so appropriate actions can be taken at that time.**

**The DEIS does not attempt to, nor is it required to, put forward every possible impact or mitigation measure, nor does it guarantee that the mitigation measures that are presented will be implemented.**



STATE OF WASHINGTON

**DEPARTMENT OF ARCHAEOLOGY & HISTORIC PRESERVATION**

1063 S. Capitol Way, Suite 106 • Olympia, Washington 98501

Mailing address: PO Box 48343 • Olympia, Washington 98504-8343

(360) 586-3065 • Fax Number (360) 586-3067 • Website: [www.dahp.wa.gov](http://www.dahp.wa.gov)

December 8, 2006

Mr. Doug Smith, Director  
City of Liberty Lake  
22710 E. Country Vista Drive  
Liberty Lake, WA 99019

Log: 120806-16-SP  
Property: Urban Growth Boundary EIS

Dear Mr. Smith:

We have recently become aware of your urban growth boundary EIS. We have reviewed the current city boundaries and alternatives presented in the EIS. There are multiple recorded archaeological sites in the City of Liberty Lake not mentioned in the text of the EIS. There are also likely archaeological sites associated with the various cultural landmarks that were mentioned in the texts, especially the homesteads.

Some of the landforms in the alternatives for the UGA have a high probability for archaeological resources. In addition, only a tiny portion of the land in the alternatives has been surveyed specifically for cultural resources, so the impacts cannot accurately be assessed at this time.

We do recommend professional archaeological surveys of project areas be conducted prior to ground disturbing activities in the future, especially near the lake, rivers, streams, wetlands, Carlson Hill, and the homesteads. We also recommend consultation with the concerned tribes cultural committees and staff regarding cultural resource issues.

As you know, archaeological sites are protected from unpermitted disturbance on both public and private lands per RCW 27.53 and 27.44. We strongly suggest archaeological surveys be conducted prior to projects with ground disturbing activities due to the fact that identifying sites and/or burials during construction usually results in costly construction delays and damage to the resource. If resources are identified *prior* to project commencement, avoidance or mitigation can be a cost-effective part of the planned development.

These comments are based on the information available at the time of this review and on behalf of the State Historic Preservation Officer. Thank you for the opportunity to comment. Should you have any questions, please feel free to contact me at (360) 586-3083 or [Stephenie.Kramer@dahp.wa.gov](mailto:Stephenie.Kramer@dahp.wa.gov).

Sincerely,

Stephenie Kramer  
Assistant State Archaeologist

cc: Randy Abrahamson  
Quanah Matheson  
Camille Pleasants



**DEPARTMENT OF ARCHAEOLOGY & HISTORIC PRESERVATION**

*Protect the Past, Shape the Future*

2006 11 4

**Response to Stephanie Kramer, Assistant State Archaeologist, Department of  
Archaeology & Historic Preservation:**

**As suggested in the comment letter, detailed analysis of impacts and implementation of mitigation measures will take place upon application of specific projects so appropriate actions can be taken at that time.**



## SPOKANE VALLEY FIRE DEPARTMENT

*Spokane County Fire District 1*

10319 EAST SPRAGUE AVE. • SPOKANE VALLEY, WA 99206-3676 • (509) 928-1700 • FAX (509) 892-4125

Mike Thompson  
Chief

Received By  
City of Liberty Lake

NOV 27 2006

City Clerk/Treasurer  
Initials \_\_\_\_\_

November 22, 2006

DEIS Comments  
City of Liberty Lake  
Planning & Community Development Dept.  
22710 E. Country Vista Dr.  
Liberty Lake, WA 99019

Doug:

We have reviewed your Draft Environmental Impact Statement regarding the proposed changes to the Urban Growth Area Boundaries and would like to offer the following comments regarding fire protection and EMS:

Page 3-10, Section 3.3.1.1, paragraph 3: Your draft states the existing WSRB rating for SCFD#1 is 4 which is incorrect. Fire District 1 has a rating of 3. (The current rating for the City of Liberty Lake is 4, however we expect to have that also lowered to 3 following the addition of equipment and personnel next Spring.) } 1

In the same section, paragraph 5; regarding services provided by Fire District 1 and Fire District 8 states, "Each district provides emergency medical service (EMS), as well as fire suppression." While this is accurate as stated, it implies that the service levels are similar which is not correct. Fire District 1 provides Advanced Life Support (paramedic) service and also provides a higher level of fire suppression service as indicated by the difference in the WSRB insurance ratings. } 2

We believe it would be a mistake for the City of Liberty Lake to annex properties in two different fire districts because of the disparity in service levels and the potential problems that disparity could create. } 3

Finally, in Section 3.3.1.2 your draft states, "Population growth and developments are expected to place additional demands on fire-related service delivery and EMS calls under all alternatives (emphasis added). Since the stated purpose of your request is for "...adding developable lands to Liberty Lake's UGA and rezoning this land to allow urban levels of development" it follows that the increased development will have a more significant impact on fire and EMS services than the existing land use. This impact difference has not yet been identified in your draft. } 4

Thank you for your consideration,

A handwritten signature in cursive script that reads "David Lobdell".

David Lobdell  
Assistant Fire Chief

**Response to David Lobdell, Assistant Fire Chief, Spokane Valley Fire Department,  
Spokane County Fire District 1:**

- 1) The text of the FEIS has been changed to correct this inaccuracy.
- 2) The text of the FEIS has been changed to reflect this comment.
- 3) Not a comment on the adequacy of the DEIS, but rather an expression of preference for a particular planning outcome.
- 4) The DEIS does not attempt to, nor is it required to, put forward every possible impact or mitigation measure, nor does it guarantee that the mitigation measures that are presented will be implemented.

## Amanda Tainio

---

**From:** Doug Smith [dsmith@libertylakewa.gov]  
**Sent:** Friday, December 08, 2006 3:56 PM  
**To:** Mary Wren  
**Cc:** Amanda Tainio  
**Subject:** FW:

-----Original Message-----

**From:** Quanah Matheson [mailto:qmatheson@cdatribe-nsn.gov]  
**Sent:** Friday, December 08, 2006 3:18 PM  
**To:** dsmith@libertylakewa.gov  
**Subject:**

Mr. Smith

Please find in the attachment our comments to the (UGA).

Quanah Matheson  
Cultural Resource Manager/THPO  
Coeur d'Alene Tribe  
208-686-0675  
[qmatheson@cdatribe-nsn.gov](mailto:qmatheson@cdatribe-nsn.gov)

12/8/06